



## Response to Planning for the Future - White Paper

**Q2 a & b). Do you get involved with planning decisions in your local area? [Yes / No] If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]**

From various discussions held over the last few years, Leicester Civic Society is of the opinion that there are three main reasons why people do not regularly get involved in planning decisions: lack of understanding of planning rules and grounds for objection, lack of awareness of applications and the belief that their views will not make a difference to the decision.

We remain concerned that the proposals will do nothing to improve the first of these, and consultation is likely to remain dominated by “those willing and able to navigate the process.”

Local authorities are already moving towards a digital approach to planning, with lists of applications published online and online submission of planning responses currently possible. Many are also rolling out online services which allow residents to access a variety of services and receive notifications of planning applications in their local area. Posting notices on lampposts still has its use though, as not everyone is a very frequent user of the internet. Until all ages and economic classes become habitual internet users, removing the need to post notices around a site only decreases certain groups' ability to contribute.

**Q3). Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future? [Social media / Online news / Newspaper / By post / Other – please specify]**

There should be a wide range of methods for people to be made aware of planning issues. While digital processes should be encouraged, these should not be used in isolation where other sources can also be effective including online notifications, social media and existing non-digital methods.

**Q4). What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]**

As a Civic Society, our top priority is protection of heritage buildings and areas. We believe that protecting and promoting heritage buildings in Leicester enhances the local built environment. We are also concerned with protection of green spaces, due to the multiple benefits they have for the local population. We are also concerned to support the agenda to promote biodiversity and support action to tackle the effects of climate change. Planning has a role to play in ensuring, for example, true sustainability and energy efficiency in new construction.



**Q5). Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]**

Yes, although criteria for local standards would have to be included. These would cover things like building height, building use, sustainable construction and mitigation of effects on the environment. Once the standards are set for a local area, developers and planning authorities should not be allowed to ignore them when an application is proposed.

**Q6). Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement].**

Not sure. Where a local plan would duplicate a certain national policy, it should reference this policy and possibly summarise it. Protection for listed buildings should remain as they are, with additional oversight included for each relevant application.

**Q7a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact? [Yes / No / Not sure. Please provide supporting statement.]**

Not sure. The definition of “sustainable development” must be set out clearly before any tests can be included in local plans. Consultation on the definition should be carried out with relevant organisations before being set, rather than being set by central government alone. Local plans should also contain information about how sustainable development will be implemented.

**Q8 a) and b). Do you agree that a standard method for establishing housing requirements (that takes into account constraints should be introduced? [Yes / No / Not sure. Please provide supporting statement.]**

**Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]**

Yes, but the method of calculating housing requirements should focus primarily on housing need, e.g. affordable housing, rather than on what developers would like to construct. We are concerned that the current system finds developers trying to avoid provision of affordable housing in their plans due to viability arguments. New processes should avoid the adversarial nature of the current system.



**Q9 a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement.]**

Yes, but only if detailed consultation is held with local communities outlining what will be allowed in the 'Growth Area'. This should be done prior to the local plan being adopted.

**Q9 b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]**

Development in protected areas should be subject to the same level of scrutiny as at present. The change in planning policy should not be an excuse to water down current rules provisions to preserve local heritage, for example, construction within a conservation area.

**Q9 c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement]**

No. Our view is that this move would mean that the views of local people would not be heard and unsuitable development could be forced upon communities.

**Q12). Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]**

No. We are concerned this proposal would only allow six weeks for public consultation of a plan. This would be undemocratic and would undermine the public's faith in the process.

**Q15). What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]**

Other. The ability of the current system to require quality of design seems haphazard. Leicester Civic Society sponsors local design awards in an attempt to provide some leadership in this area. But it needs local and central government to show real leadership in this important area. We want to avoid having to accept buildings which are either bland, or worse still, ugly and inappropriate to the city.

**Q17). Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement]**

Yes. Local communities need to be involved in deciding what is to be considered acceptable in their local design guide and codes in terms of style of building, height and size of houses/flats. Local authorities should retain oversight of developments to ensure that developers adhere to agreed guides and codes.



**Q20). Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]**

Not sure. In theory, this could really work well, although rigorous standards would have to be agreed locally regarding definitions of “beauty”. Local planning authorities should retain some level of oversight of developments to ensure they meet the agreed standards.

If permitted development rights are extended, there would still need to be some controls, e.g. no automatic right to demolish any building on the local interest list, limits to the size that upward extensions could be before separate planning permission has to be sought.

**Q21). When new development happens in your area, what is your priority for what comes with it? [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other – please specify]**

Other. Quality of design is a major concern for Leicester Civic Society along with the provision of local infrastructure. We note that in the white paper mentions exploring “whether suitably experienced architectural specialists can have earned autonomy from routine listed building consents”. Our concern here would be that it would remove a level of scrutiny for applications relating to buildings which have been recognised as being of national importance. Historic England and local interest groups, as well as individual residents must be allowed the opportunity to review and comment on any applications relating to listed buildings.

**Q22 a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold? [Yes / No / Not sure. Please provide supporting statement.]**

Yes. We propose that part of the levy should be paid up front, with the balance payable on completion of construction. Levy payments should also provide flexibilities for local authorities to use in projects not directly related to an individual development, but should be ring-fenced for the delivery of new homes.

**Q22 b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]**

Nationally at an area-specific rate. Local authorities should not be able to deliberately set a low rate for the levy to make their area more attractive and “developer-friendly” than other areas. There needs to be a national standard.



**Q22 c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]**

Not sure, but we strongly feel the provision if affordable housing should become a mandatory part of any major residential development.

**Q23). Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]**

Yes. In Leicester, there have been some good examples where former factory buildings and other non-residential properties have been converted for residential use. Redevelopment of disused buildings in a sympathetic way and good design is a sustainable approach to development which the Civic Society endorses.

**Q24 a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]**

Yes. The provision of affordable housing must be increased to meet the identified need. Innovative solutions to increase provision should be encouraged.

**Q24 d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]**

There should definitely be a minimum size limit set as standard, so that developers can't just build small "hamster cages" and call them homes. Quality of construction and energy efficiency should also be taken into account.

**Q25). Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]**

Not sure. Restrictions for local authorities should only be loosened if it can be demonstrated that they have consulted with local residents regarding how the infrastructure resources are spent.